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HORIZON BLUE CROSS BLUE SHIELD OF NEW JERSEY

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

THE REGENTS OF THE
UNIVERSITY OF CALIFORNIA, a
public trust corporation, on behalf of
THE UNIVERSITY OF
CALIFORNIA, IRVINE MEDICAL
CENTER,
Plaintiff,
v.
HORIZON BLUE CROSS BLUE
SHIELD OF NEW JERSEY,
Defendant.

Plaintiff THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, a public trust corporation, on behalf of THE UNIVERSITY OF CALIFORNIA, IRVINE MEDICAL CENTER (“Plaintiff” or “UC Irvine Health”) and Defendant HORIZON BLUE CROSS BLUE SHIELD OF NEW JERSEY (“Defendant” or “Horizon”), by and through their respective counsel of record, hereby stipulate that the discovery deadlines set forth in the Court’s Pretrial Scheduling Order be extended, pursuant to FRCP 29, as follows:

RECITALS

WHEREAS this matter was removed to this court pursuant to a Notice of Removal filed by Horizon on July 1, 2024;

WHEREAS, Horizon filed a Notice of Motion to Dismiss on October 9, 2024, with UC Irvine Health filing its Opposition on October 21, 2024 and Horizon filing its Reply on November 22, 2024;

WHEREAS on November 22, 2024 this Court entered a Pretrial Scheduling Order providing that Interrogatories and Requests for Production were to be propounded by January 28, 2025 and responded to by February 28, 2025; and that fact discovery was to remain open through June, 30, 2025;

WHEREAS, on January 28, 2025, UC Irvine Health propounded a First Set of Requests for Production of Documents and First Set of Interrogatories to Horizon, responses to which are due on February 28, 2025;

WHEREAS, on January 31, 2025, pursuant to an agreed upon extension of the deadline in the Pretrial Scheduling Order, Horizon propounded a First Set of Requests for Production of Documents and First Set of Interrogatories to UC Irvine Health, responses to which are due on March 3, 2025; and

WHEREAS this Court has not yet issued a ruling on Horizon's Motion to Dismiss.

STIPULATION

THEREFORE, the Parties stipulate that given the pendency of this Court's ruling on Horizon's dispositive motion, and to the extent that said motion is denied in whole or in part, the time for each party to respond to propounded discovery should be extended to 30 days following the Court's ruling.

The parties further request that the fact discovery cut-off be extended to a time deemed appropriate by the Court, based upon when the Court rules on the pending dispositive motion.

Dated: February 28, 2025

<p>STEPHENSON, ACQUISTO & COLMAN, INC.</p> <p><u>/s/ Karlene J. Rogers-Aberman</u> Karlene J. Rogers-Aberman NJ Attorney I.D.: 302962019 500 N. Brand Blvd., Suite 1450 Glendale, CA 91502 Tel. 818.559.4477 Fac. 818.559.5484 kaberman@sacfirm.com</p> <p><i>Attorneys for UC Irvine Health</i></p>	<p>ROBINSON & COLE LLP</p> <p><u>/s/ Adam J. Petitt</u> Adam J. Petitt NJ Attorney I.D.: 020822008 Joshua Dachs NJ Attorney I.D.: 29712020 1650 Market Street, Suite 3030 Philadelphia, PA 19103 Tel. 215.398.0562 apetitt@rc.com jdachs@rc.com</p> <p><i>Attorneys for Horizon Blue Cross Blue Shield of New Jersey</i></p>
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